

EXHIBIT C

Deposition of  
**Jason W. Beaman, D.O., M.S., M.P.H., FAPA**  
September 30, 2021

Dillard  
vs.  
City of Springdale



Jason W. Beaman, D.O., M.S., M.P.H., FAPA

Dillard vs.  
City of Springdale

IN THE UNITED STATES DISTRICT COURT  
FOR THE WESTERN DISTRICT OF ARKANSAS  
FAYETTEVILLE DIVISION

JILL DILLARD, JESSA SEEWALD, JINGER ) Case No.  
VUOLO, and JOY DUGGAR ) 5:17-CV-05089-TLB

Plaintiffs,

vs.

CITY OF SPRINGDALE; WASHINGTON COUNTY;  
KATHY O'KELLEY; ERNEST CATE; RICK HOYT;  
STEVE ZEGA; BAUER PUBLISHING COMPANY,  
L.P.; BAUER MAGAZINE, L.P.; BAUER MEDIA  
GROUP, INC.; BAUER, INC; HEINRICH BAUER  
NORTH AMERICA, INC; BAUER MEDIA GROUP  
USA, LLC; and DOES 1-10, inclusive,

Defendants.

DEPOSITION OF JASON W. BEAMAN, D.O, M.S., M.P.H., FAPA  
via Zoom videoteleconference  
Thursday, September 30, 2021

REPORTED BY: Derek L. Hoagland

CSR No. 13445

Job No. 10089281

Jason W. Beaman, D.O., M.S., M.P.H., FAPA

Dillard vs.  
City of Springdale

1  
2  
3  
4  
5  
6  
7  
8  
9  
10  
11  
12  
13  
14  
15  
16  
17  
18  
19  
20  
21  
22  
23  
24  
25

IN THE UNITED STATES DISTRICT COURT  
FOR THE WESTERN DISTRICT OF ARKANSAS  
FAYETTEVILLE DIVISION

JILL DILLARD, JESSA SEEWALD, JINGER	) Case No.
VUOLO, and JOY DUGGAR	) 5:17-CV-05089-TLB
	)
Plaintiffs,	)
	)
vs.	)
	)
CITY OF SPRINGDALE; WASHINGTON COUNTY;	)
KATHY O'KELLEY; ERNEST CATE; RICK HOYT;	)
STEVE ZEGA; BAUER PUBLISHING COMPANY,	)
L.P.; BAUER MAGAZINE, L.P.; BAUER MEDIA	)
GROUP, INC.; BAUER, INC; HEINRICH BAUER	)
NORTH AMERICA, INC; BAUER MEDIA GROUP	)
USA, LLC; and DOES 1-10, inclusive,	)
	)
Defendants.	)
	)

Deposition of JASON W. BEAMAN, D.O, M.S., M.P.H., FAPA,  
taken before Derek L. Hoagland, a Certified Shorthand  
Reporter for the State of California, commencing at  
9:09 a.m., Thursday, September 30, 2021, via Zoom  
videoteleconference.

**Jason W. Beaman, D.O., M.S., M.P.H., FAPA**

**Dillard vs.  
City of Springdale**

1 APPEARANCES:

2 (ALL COUNSEL APPEARING VIA VIDEOTELECONFERENCE)

3 COUNSEL FOR PLAINTIFF

4 LARSON LLP

5 555 South Flower Street, Suite 4400

6 Los Angeles, California 90071

7 BY: STEVE E. BLEDSOE, ESQ.

8 213.436.4888

9 slarson@larsonllp.com

10

11 COUNSEL FOR DEFENDANTS RICK HOYT, ET AL., SEPARATE

12 WASHINGTON COUNTY

13 JASON OWENS LAW FIRM, P.A.

14 1023 Main Street, Suite 204

15 Conway, Arkansas 72032

16 BY: JASON E. OWENS, ESQ.

17 501.764.4334

18 owens@jowenslawfirm.com

19

20 COUNSEL FOR SPRINGDALE DEFENDANTS

21 HARRINGTON, MILLER, KIEKLAK,

22 EICHMANN & BROWN, P.A.

23 4710 S. Thompson, Suite 102

24 Springdale, AR 72764

25 BY: R. JUSTIN EICHMANN, ESQ.

479.751.6464

jeichmann@arkansaslaw.com

-- AND --

KENDALL LAW FIRM, PLLC

3706 Pinnacle Hills Parkway, Suite 201

Rogers, Arkansas 72758

BY: SUSAN KELLER KENDALL, ESQ.

479.464.9828

skk@kendalllllawfirm.com

21

22

23

24

25

Jason W. Beaman, D.O., M.S., M.P.H., FAPA

Dillard vs.  
City of Springdale

1 did in this case involved what's called a record review?

2 A. I think that's fair.

3 Q. What is a record review?

4 A. Well, as it relates to this case, I would say  
5 that I formed my opinion by relying on records and not  
6 through evaluating the plaintiffs.

7 Q. Does an assessment based on a record review  
8 contain any limitations, as opposed to an assessment --  
9 withdrawn.

10 Is it true that an assessment based on a record  
11 review has significant limitations in arriving to  
12 opinions supported by evidence that reaches the level of  
13 medical or scientific certainty that is the standard for  
14 a forensic examinations?

15 A. I'm sorry. You're going to have to repeat that.

16 Q. Sure. Well, does the fact that your opinion is  
17 based on a record review rather than your own  
18 examination and interview of the plaintiffs and tests  
19 that you had conducted in connection with plaintiffs,  
20 does that present any limitations in your ability to  
21 give an opinion in this case?

22 A. Well, it would depend on the opinions that I  
23 would be asked to give. So (inaudible) specific  
24 opinion, I could tell you whether or not my not doing an  
25 evaluation would limit that opinion.

Jason W. Beaman, D.O., M.S., M.P.H., FAPA

Dillard vs.  
City of Springdale

1 Q. Anywhere in your expert report that you identify  
2 any limitations that -- on your opinion based on the  
3 fact that you did not conduct interviews or perform any  
4 testing in connection with the plaintiffs?

5 A. No.

6 Q. Do you believe that your opinions would be  
7 assisted or -- withdrawn.

8 Do you believe that your ability to provide  
9 opinions in this case would be assisted if you were able  
10 to interview the plaintiffs yourself and perform your  
11 own testing?

12 A. The -- you're asking about the opinions that I  
13 listed in regards to Dr. Wynne's evaluation?

14 Q. I'm talking about your ability to assess the  
15 plaintiffs?

16 A. But I did not assess the plaintiffs.

17 Q. Okay. So is it fair to say in this case, you  
18 did not perform any sort of independent assessment of  
19 plaintiffs, you just were retained to critique the work  
20 that Dr. Wynne had done?

21 A. To assess procedures, methods, evaluation, and  
22 opinion of Dr. Wynne.

23 Q. So you were retained to critique Dr. Wynne, not  
24 to perform your own evaluation, correct?

25 A. I was not retained to evaluate the plaintiffs.

Jason W. Beaman, D.O., M.S., M.P.H., FAPA

Dillard vs.  
City of Springdale

1 Q. Okay. Are any of the plaintiffs in this case  
2 suffering any sort of emotional trauma as a result of  
3 the fact that the details of their sexual abuse were  
4 published in the national media?

5 A. Well, I think you would have to define emotional  
6 trauma. And I would say that Dr. Wynne's opinion in his  
7 assessment was that they were suffering from emotional  
8 trauma.

9 Q. Okay. But what's your definition of emotional  
10 trauma?

11 A. So trauma is a -- I think, a big word. There  
12 are different reactions that individuals have to a  
13 situation, and it can be from momentary anxiety to  
14 stress. And then when you say "trauma," it's speaking  
15 to a person's reaction to a specific situation. So  
16 emotional trauma, emotions are feelings, and so trauma,  
17 that causes a change in your feelings.

18 Q. Let me ask you this.

19 Have you formed an opinion one way or another  
20 whether any of the plaintiffs in this case have suffered  
21 emotional distress as a result of the release of the  
22 details of their sexual molestation by their brother to  
23 the national media?

24 A. I have formed an opinion that that evidence does  
25 or does not exist in Dr. Wynne's evaluation.



Jason W. Beaman, D.O., M.S., M.P.H., FAPA

Dillard vs.  
City of Springdale

1 Q. And that's not my question. My question to you  
2 is: Have you formed an opinion one way or another  
3 whether the plaintiffs in this case have suffered  
4 emotional distress as a result of the release of the  
5 details of their sexual molestation by their brother to  
6 the national media?

7 A. Again, "emotional distress" is kind of a vague  
8 word. If you want to tell me what your definition of  
9 emotional distress is, I will tell you whether or not I  
10 believe they have it.

11 Q. Okay. What's your definition of emotional  
12 distress?

13 A. So emotion, again, being feelings, distress  
14 being a sense of being uncomfortable.

15 Q. Okay. Using your definition of emotional  
16 distress, have you formed an opinion whether the  
17 plaintiffs in this case have suffered emotional distress  
18 as a result of the release of the details of their  
19 sexual molestation by their brother to the national  
20 media?

21 A. I believe by their reports to Dr. Wynne that the  
22 plaintiffs were uncomfortable and had a change in their  
23 feelings when -- which is my definition of emotional  
24 distress, so -- when the sexual abuse perpetrated on  
25 them by their brother was disclosed too the media.

Jason W. Beaman, D.O., M.S., M.P.H., FAPA

Dillard vs.  
City of Springdale

1 Q. What's your definition of emotional trauma?

2 A. It would be similar to emotional distress,  
3 distress being uncomfortable, but trauma being permanent  
4 or semipermanent damage.

5 Q. Have you formed an opinion whether any of the  
6 plaintiffs in this case have suffered emotional trauma  
7 as a result of the release of the details of their  
8 sexual molestation by their brother to the national  
9 media and to the public?

10 A. By my definition of trauma, using a, you know,  
11 prolonged damage, my opinion would be that they did not.

12 Q. By the way, do you have any daughters?

13 A. I do.

14 Q. How many?

15 MS. OWENS: Object to form.

16 THE DEPONENT: Yeah, I don't know that I feel  
17 comfortable talking about my family, and it's definitely  
18 not related to my expert opinion.

19 BY MR. BLEDSOE:

20 Q. I just want to see -- I want to see what your  
21 life experience is.

22 You're married, right?

23 A. Again, I don't know that my marital status  
24 really has anything to do with my expert opinion.

25 Q. Are you married?

Jason W. Beaman, D.O., M.S., M.P.H., FAPA

Dillard vs.  
City of Springdale

1 challenges. She continued to be harassed and haunted by  
2 social media, and she characterized herself as vigilant,  
3 emotionally on edge, and angry.

4 Q. Anything else?

5 A. Not that I can recall.

6 Q. What is the current -- there was a beep, so I'll  
7 start over. Withdrawn.

8



Jason W. Beaman, D.O., M.S., M.P.H., FAPA

Dillard vs.  
City of Springdale

1

[REDACTED]

23 Q. Anything else?

24 A. Not that I can recall.

25

[REDACTED]

Jason W. Beaman, D.O., M.S., M.P.H., FAPA

Dillard vs.  
City of Springdale

1

[REDACTED]

16

[REDACTED]

Jason W. Beaman, D.O., M.S., M.P.H., FAPA

Dillard vs.  
City of Springdale

1

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

17 Q. Okay. Now, going back to page 8 of Exhibit 34,  
18 under No. 2, it goes on to read:

19 "Dr. Wynne agreed that she over-reported. He  
20 just believed that she did it as a cry for help."

21 Do you see that?

22 A. Yes.

23 Q. So No. 2, because it's not up, but I remember  
24 seeing that -- oh, it's still on the screen. Can you  
25 see it on the screen?

Jason W. Beaman, D.O., M.S., M.P.H., FAPA

Dillard vs.  
City of Springdale

1 that be being exposed to sexual violence?

2 A. It would be -- I'm sorry.

3 Can you repeat your question?

4 Q. Sure. If someone re-experiences sexual  
5 violence, is that tantamount to experiencing sexual  
6 violence?

7 A. Well, they experience the sexual violence to  
8 begin with, so it would be an extenuation of the sexual  
9 violence that they initially had.

10 Q. How traumatic is re-experiencing sexual  
11 violence?

12 A. That certainly depends on the individual and the  
13 circumstances regarding that assault.

14 Q. The criteria in Section A says:  
15 "Exposure to actual or threatened," and it goes  
16 on to say, "sexual violence."

17 Do you see that?

18 A. I do.

19 Q. How would you compare re-experiencing sexual  
20 violence to exposure to actual or threatened sexual  
21 violence?

22 A. I would find it to be an extenuation of the  
23 sexual violence.

24 Q. What do you mean when you say an extenuation of  
25 the sexual violence?

Jason W. Beaman, D.O., M.S., M.P.H., FAPA

Dillard vs.  
City of Springdale

1 A. That someone is sexually assaulted and there's  
2 trauma associated with that, and if they reexperience  
3 that through reminders or something like that, it is an  
4 extenuation of the sexual violence that they had. It's  
5 a -- it's part of that initial sexual assault.

6 Q. What is the definition of sexual trauma, if you  
7 know? And, frankly, we can put it up on the screen. I  
8 don't mean to -- this doesn't need to be a memory  
9 contest. I don't want to be unfair. Let's do that.  
10 Let me withdraw the question.

11 We are going to put something up on the screen,  
12 an exhibit. Hang on. It's going to take me a minute to  
13 find my copy of this exhibit.

14 All right. I will represent to you that we have  
15 put up the definition of sexual trauma as found in the  
16 American Psychological Association Dictionary of  
17 Psychology.

18 Do you see that?

19 A. I do.

20 Q. Do you know what the American Psychological  
21 Association Dictionary of Psychology is?

22 A. No.

23 Q. Okay. Well, we'll go forward anyways.

24 Do you see in the American Psychological  
25 Association Dictionary of Psychology that the definition



Jason W. Beaman, D.O., M.S., M.P.H., FAPA

Dillard vs.  
City of Springdale

REPORTER'S CERTIFICATE

STATE OF CALIFORNIA ) ss.

I, DEREK L. HOAGLAND, CSR #13445, State of California,  
do hereby certify:

That prior to being examined, the witness named in the  
foregoing proceeding was by me sworn to testify to the  
truth, the whole truth and nothing but the truth;

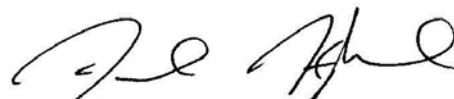
That said proceeding was taken down by me by stenotype  
at the time and place therein stated and thereafter  
transcribed under my direction into computerized  
transcription.

I further certify that I am not of counsel nor attorney  
for nor related to the parties hereto, nor am I in any  
way interested in the outcome of this action.

Further, that if the foregoing pertains to  
the original transcript of a deposition in a federal  
case, before completion of the proceedings, review of  
the transcript [ X ] was [ ] was not requested.

In compliance with section 8016 of the Business and  
Professions Code, I certify under penalty of perjury  
that I am a certified shorthand reporter with license  
number 13445 in full force and effect.

Witness my hand this October 15, 2021.



DEREK L. HOAGLAND, CSR #13445